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UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF RHODE ISLAND

In Re: Gerald R. Galleshaw Debtor

DAVID C. FRAIOLI and NEW

ENGLAND AUTO CENTER, INC.

Plaintiffs : C.A. NO. 15-11047

:

V. : Chapter 7

:

GERALD R. GALLESHAW : ADV. PRO. NO.: 15-01023

Defendant

MOTION TO EXTEND TIME

NOW COMES THE DEBTOR(S), and moves this Court for an extension of time, up to and including the 23rd day of May, 2016 to file the following documents:

1. Joint Pretrial Statement.

As grounds thereof, the Debtor, Gerald Galleshaw, has filed an Application of Default against the Plaintiffs. The Plaintiffs' response to the pending Application for Default is due May 16, 2016. The Debtor respectfully requests additional time to file the Joint Pretrial Statement.

WHEREFORE, the Debtor prays this Honorable Court grant his motion to extend time and allow him additional time to file the Joint Pretrial Statement.

Date: May 2, 2016

Respectfully submitted, Debtor, Gerald Galleshaw, By his Attorney,

/s/ Todd S. Dion_

Todd S. Dion Esq. (RIBAR # 6852) 1599 Smith Street North Providence, RI 02911 401-965-4131 Phone 401-353-1231 Fax toddsdion@msn.com

CERTIFICATION

I hereby certify that on May 2, 2016, a copy of the foregoing document, filed through the CM/ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies shall be served by first class mail postage prepaid on the parties listed on the NEF as not receiving electronic notice.

/s/ Todd S. Dion
Todd S. Dion, Esq.